

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA  
JOHNSTOWN DIVISION

ANTHONY J. ZANGHI, KENNETH J.  
SOWERS, DOMINIC MCCUCH, JAMES  
HOHMAN, DARRELL SHETLER on behalf of  
themselves and others similarly situated, and  
UNITED STEEL, PAPER AND FORESTRY,  
RUBBER, MANUFACTURING, ENERGY,  
ALLIED INDUSTRIAL AND SERVICE  
WORKERS INTERNATIONAL UNION,  
AFL-CIO/CLC,

Plaintiffs,

Vs.

FREIGHTCAR AMERICA, INC.,  
JOHNSTOWN AMERICA CORPORATION,  
and JOHNSTOWN AMERICA  
CORPORATION USWA HEALTH &  
WELFARE PLAN,

Defendants.

: Civil Action No.: 3:13-cv-0146

:

: District Judge Kim R. Gibson

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: Class Action

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**MOTION FOR ADMISSION *PRO HAC VICE* OF VINCENT J. CONNELLY**

Vincent J. Connelly, undersigned counsel for Defendants, Freightcar America, Inc., Johnstown America Corporation and Johnstown America Corporation USWA Health & Welfare Plan, hereby move that Vincent J. Connelly be admitted to appear and practice in this Court as counsel *pro hac vice* for Defendants, Freightcar America, Inc., Johnstown America Corporation and Johnstown America Corporation USWA Health & Welfare Plan in the above-captioned matter pursuant to LCvR 83.2 and LCvR 83.3 and this Court's Standing Order Regarding Pro Hac Vice Admissions dated May 31, 2006 (Misc. No. 06-151).

In support of this motion, undersigned counsel attaches the Affidavit for Admission *Pro Hac Vice* of Vincent J. Connelly, which, it is averred satisfies the requirements of the foregoing Local Rules and Standing Order.

Respectfully submitted,

/s/ Vincent J. Connelly  
Attorney I.D. #0501557  
Mayer Brown LLP  
71 S. Wacker Drive  
Chicago, Illinois 60606  
312-701-7912

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system this 30th<sup>th</sup> day of April, 2015.

/s/ Vincent J. Connelly  
Attorney I.D. #0501557  
Mayer Brown LLP  
71 S. Wacker Drive  
Chicago, Illinois 60606  
312-701-7912

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: **JURY TRIAL DEMANDED**

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**AFFIDAVIT OF VINCENT J. CONNELLY IN SUPPORT OF**  
**MOTION FOR ADMISSION *PRO HAC VICE***

I, Vincent J. Connelly, make this Affidavit in support of the motion for my  
admission to appear and practice in this Court as counsel *pro hac vice* for Defendants,  
Freightcar America, Inc., Johnstown America Corporation and Johnstown America  
Corporation USWA Health & Welfare Plan, in the above-captioned matter.

I, Vincent J. Connelly, being duly sworn, do hereby depose and say as  
follows:

1. I am a Partner of the law firm of Mayer Brown, LLP.
2. My business address is 17 S. Wacker, Chicago, Illinois 60606.

3. I am a member in good standing of the bars of Illinois Supreme Court, being admitted in October, 1975 and am licensed to practice in the Northern District of Illinois, being admitted in October, 1975.

4. My bar identification number is 0501557 (Illinois).

5. A current Certificate of Admission to the Bar of Illinois is attached hereto as Exhibit "1."

6. I attest that I am a registered user of ECF in the United States District Court for the Western District of Pennsylvania.

7. I attest that I have read, know and understand the Local Rules of Court for the United States District Court for the Western District of Pennsylvania.

8. I attest that I have had no disciplinary proceedings.

9. Based on the foregoing, I respectfully request that I be granted *pro hac vice* admission in this matter.

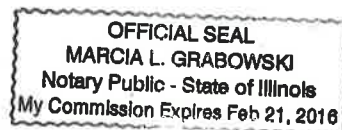
I certify and attest that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are false, I am subject to punishment.

Further, affiant sayeth naught.

  
\_\_\_\_\_  
Vincent J. Connelly

Sworn to and subscribed in my presence this 30<sup>th</sup> day of April, 2015.

  
\_\_\_\_\_  
Notary Public



## **Certificate of Admission To the Bar of Illinois**

I, Carolyn Taft Grosboll, Clerk of the Supreme Court of Illinois, do hereby certify that

Vincent J. Connelly

has been duly licensed and admitted to practice as an Attorney and Counselor of Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on October 27, 1975 and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto  
placed my hand and affixed the seal  
of said Supreme Court, at Springfield,  
in said State, this Wednesday, April 29, 2015.

*Carolyn Taft Grosboll*

Clerk

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Plaintiffs,	:	
	:	
Vs.	:	
	:	
FREIGHTCAR AMERICA, INC.,	:	
JOHNSTOWN AMERICA CORPORATION,	:	
and JOHNSTOWN AMERICA	:	
CORPORATION USWA HEALTH &	:	
WELFARE PLAN,	:	
	:	
Defendants.	:	

**ORDER**

NOW THIS, \_\_\_\_ day of \_\_\_\_\_, 2015, it is hereby ordered and decreed that Vincent J. Connelly, Esquire is admitted *Pro Hac Vice* for the purposes of serving as co-counsel for the Defendants in the above-captioned case.

BY THE COURT:

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J.